

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.,

Plaintiff,

V.

C.A. No. 04-10353-PBS

VOICE SIGNAL TECHNOLOGIES, INC.,  
LAURENCE S. GILLICK, ROBERT S.  
ROTH, JONATHAN P. YAMRON, and  
MANFRED G. GRABHERR,

Defendants.

## DECLARATION OF WENDY S. PLOTKIN

Wendy S. Plotkin deposes and states as follows:

1. I am an attorney in the law firm of Choate, Hall & Stewart, and a member of the bar of the Supreme Judicial Court of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts. I am counsel to the above-named defendants and make this declaration in support of the Voice Signal Technologies, Inc.'s Opposition to ScanSoft, Inc.'s Motion to Compel Further Production of Documents and Responses to Interrogatories.

2. Attached hereto as Ex. A is a true and correct copy of a portion of the deposition transcript of Thomas J. Lazay.

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Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Wendy S. Plotkin

Dated: June 8, 2005

# **Exhibit A**

ESQUIRE DEPOSITION SERVICES

Page 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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SCANSOFT, INC., :  
Plaintiff, :  
VS. :  
VOICE SIGNAL TECHNOLOGIES, : CASE NO.  
INC., LAURENCE S. GILICK, : 04-10353-PBS  
ROBERT S. ROTH, JONATHAN P. :  
YAMRON and MANFRED G. :  
GRABHERR, :  
Defendants. :  
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DEPOSITION OF THOMAS J. LAZAY, a witness  
called by and on behalf of the Plaintiff, taken  
pursuant to the applicable provisions of the  
Federal Rules of Civil Procedure, before  
Sandra L. Bray, Registered Diplomate Reporter,  
CSR Number 103593, and Notary Public in and for  
Commonwealth of Massachusetts, at the offices of  
Bromberg Sunstein LLP, 125 Summer Street,  
Boston, Massachusetts, on Wednesday, May 25,  
2005, commencing at 10:14 a.m.

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## ESQUIRE DEPOSITION SERVICES

Page 2		Page 4	
1	APPEARANCES:	10:14:24 1	PROCEEDINGS
2	Representing the Plaintiff:	10:14:24 2	(The Massachusetts driver's license
3	CHOATE HALL & STEWART	10:14:24 3	number as identification of the deponent
4	53 State Street	10:14:24 4	was noted for the record.)
5	Exchange Place	5	THOMAS J. LAZAY, having duly sworn or
6	Boston, Massachusetts 02109	6	affirmed that his testimony would be the truth,
7	BY: PAUL D. POPEO, P.C.	7	the whole truth, and nothing but the truth,
8		8	testified as follows:
9	Representing the Defendants:	9	* * *
10	BROMBERG SUNSTEIN LLP	10:14:29 10	EXAMINATION BY MS. FLEMING:
11	125 Summer Street	10:14:29 11	Q. Mr. Lazay, could you state your name and spell
12	Boston, Massachusetts 02110	10:14:32 12	it for the record, please?
13	BY: LISA M. FLEMING, ESQUIRE	10:14:33 13	A. Thomas Lazay, L A Z A Y.
14		10:14:36 14	Q. And, Mr. Lazay, have you been deposed before?
15		10:14:40 15	A. No, I have not.
16		10:14:40 16	Q. New experience?
17		10:14:41 17	A. Yes.
18		10:14:41 18	Q. I'm going to ask you a series of questions, and
19		10:14:44 19	if at any time you don't understand a question,
20		10:14:46 20	I want you to let me know that. My role here is
21		10:14:49 21	to ask you questions that you understand so I
22		10:14:52 22	can get intelligible answers. So it's not -- my
23		10:14:56 23	role is not to deceive you in any way. So if
24		10:15:01 24	you feel like you don't understand a question,
Page 3		Page 5	
1	INDEX	10:15:04 1	please let me know, and I'll do my best to
2	WITNESS: PAGE NO.	10:15:06 2	rephrase it. Okay?
3	THOMAS J. LAZAY	10:15:06 3	A. Okay.
4	BY MS. FLEMING 4	10:15:07 4	Q. If at any time during today's session you want
5		10:15:08 5	to take a break, let me know that too, and we'll
6	EXHIBITS	10:15:09 6	accommodate you. At some point, we'll take a
7	NO. DESCRIPTION PAGE NO.	10:15:12 7	lunch break, and we'll work that out with
8	1 Voice Signal Technologies Web	10:15:14 8	counsel as to timing.
9	2 Site Printout 13	10:15:20 9	The only other thing I would ask you,
10	3 VSuite 1.2.00 Mass Market	10:15:21 10	that when you do respond, you respond audibly
11	4 Handsets User Interface	10:15:21 11	because if you shake your head or nod,
12	5 Specification 80	10:15:23 12	oftentimes the court reporter can't record that
13	6 VSuite 2.0 Mass Market Handsets	10:15:25 13	properly, and we want to have an accurate
14	7 User Interface Specification 100	10:15:31 14	transcript when we're through today. Okay?
15	8 Document entitled Samsung	10:15:34 15	A. Okay.
16	9 Korean VSuites 129	10:15:34 16	Q. Great. Are you presently employed, Mr. Lazay?
17	10 Marketing Requirements	10:15:38 17	A. Yes, I am.
18	11 Specification 131	10:15:39 18	Q. By whom?
19	12 Copy of E-mail from	10:15:39 19	A. Voice Signal Technologies.
20	13 Mr. Gillick, dated 4-19-01 180	10:15:41 20	Q. Can you start -- give me your educational
21	14 Copy of E-mail to Mr. Yamron,	10:15:44 21	background starting with high school, please.
22	15 dated 5-7-01 195	10:15:46 22	A. I graduated from King Phillip Regional High
23	16 Document entitled Core	10:15:49 23	School in Wrentham, Massachusetts, and I have a
24	17 Technology at VST 198	10:15:51 24	bachelor's degree in computer science from

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<p>10:55:35 1 the question.</p> <p>10:55:35 2 A. Can you clarify your question?</p> <p>10:55:37 3 Q. Sure. Well, you said that Voice Tag recognizes</p> <p>10:55:41 4 speech?</p> <p>10:55:41 5 A. Yes.</p> <p>10:55:41 6 Q. And I'm wondering if VSuite also recognizes</p> <p>10:55:45 7 speech.</p> <p>10:55:46 8 MR. POPEO: Objection.</p> <p>10:55:47 9 A. VSuite can contain Voice Tag.</p> <p>10:55:51 10 Q. But on its own. My question is, on its own</p> <p>10:55:55 11 without Voice Tag, can VSuite recognize speech?</p> <p>10:55:58 12 MR. POPEO: Objection to the form of</p> <p>10:55:59 13 the question. Are you asking whether it offered</p> <p>10:56:02 14 VSuite in a configuration without a voice</p> <p>10:56:06 15 recognizer as a component?</p> <p>10:56:08 16 MS. FLEMING: I'm just asking what</p> <p>10:56:09 17 each of these products are to his understanding.</p> <p>10:56:09 18 MR. POPEO: Let's have some</p> <p>10:56:10 19 clarification. If you need her to rephrase the</p> <p>10:56:12 20 question, you ought to ask for that. So let's</p> <p>10:56:16 21 continue.</p> <p>10:56:20 22 A. Did you ask whether VSuite can be configured</p> <p>10:56:23 23 without Voice Tag?</p> <p>10:56:25 24 Q. Yes.</p>	<p>10:57:14 1 Q. What does VSuite Version 1.1 do as a product?</p> <p>10:57:19 2 A. VSuite 1.1 can recognize voice commands. It can</p> <p>10:57:31 3 recognize sequences of digits, and it can</p> <p>10:57:39 4 interact with other software on the phone.</p> <p>10:57:43 5 MR. POPEO: Miss Fleming, can we go</p> <p>10:57:46 6 off the record for a second?</p> <p>10:57:47 7 MS. FLEMING: Sure.</p> <p>10:58:13 8 (Discussion off the record)</p> <p>10:58:19 9 (Recess taken from 10:58 a.m. to</p> <p>11:02:10 10 11:02 a.m.)</p> <p>11:02:13 11 Q. Okay. Mr. Lazay, before the break, we were</p> <p>11:02:15 12 talking about the various products that Voice</p> <p>11:02:18 13 Signal offers and sells or develops, and you</p> <p>11:02:21 14 were describing for me what VSuite is. Do you</p> <p>11:02:24 15 remember that testimony?</p> <p>11:02:24 16 A. I do.</p> <p>11:02:26 17 Q. Okay. And am I correct that Voice -- you</p> <p>11:02:31 18 testified that Voice Tag is a speech recognizer,</p> <p>11:02:34 19 correct?</p> <p>11:02:35 20 A. Correct.</p> <p>11:02:35 21 Q. And Voice Tag can be configured with VSuite?</p> <p>11:02:39 22 A. Voice Tag can be contained within VSuite.</p> <p>11:02:43 23 Q. Can be contained in VSuite. Thank you. But it</p> <p>11:02:48 24 doesn't have to be?</p>
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<p>10:56:26 1 A. Yes, it can.</p> <p>10:56:26 2 Q. What does VSuite do if it doesn't have Voice Tag</p> <p>10:56:31 3 configured in it?</p> <p>10:56:32 4 MR. POPEO: Object to the form of the</p> <p>10:56:34 5 question. Are you asking whether there are</p> <p>10:56:35 6 configurations of VSuite which don't contain</p> <p>10:56:38 7 Voice Tag?</p> <p>10:56:39 8 MS. FLEMING: He already answered</p> <p>10:56:40 9 that.</p> <p>10:56:40 10 MR. POPEO: I think your question</p> <p>10:56:41 11 assumes a fact which is not in evidence. You</p> <p>10:56:43 12 can answer the question if you can.</p> <p>10:56:44 13 A. I'm just not clear on the question.</p> <p>10:56:46 14 Q. Then why don't you tell me what VSuite does as a</p> <p>10:56:50 15 product?</p> <p>10:56:51 16 A. Again, that depends on the version of VSuite and</p> <p>10:56:55 17 the particular configuration.</p> <p>10:56:58 18 Q. And do you know about the different versions of</p> <p>10:57:00 19 VSuite?</p> <p>10:57:01 20 A. I do.</p> <p>10:57:01 21 Q. So let's take Version -- VSuite Version 1.1.</p> <p>10:57:10 22 Are you familiar with that?</p> <p>10:57:11 23 A. I believe I'm -- at a high level, I'm familiar</p> <p>10:57:14 24 with it.</p>	<p>11:02:50 1 MR. POPEO: You said contained in each</p> <p>11:02:51 2 iteration of VSuite?</p> <p>11:02:53 3 Q. Or in any iteration of VSuite.</p> <p>11:02:56 4 A. Yes.</p> <p>11:02:56 5 Q. And if Voice Tag is not contained in VSuite,</p> <p>11:03:02 6 does VSuite work as a user interface? Does it</p> <p>11:03:05 7 perform its functions as a user interface?</p> <p>11:03:08 8 MR. POPEO: I object to the form of</p> <p>11:03:09 9 the question.</p> <p>11:03:09 10 A. VSuite can function if it has another recognizer</p> <p>11:03:13 11 inside.</p> <p>11:03:13 12 Q. Okay. Does Voice Signal have other recognizers</p> <p>11:03:20 13 by common names that you can name for me?</p> <p>11:03:22 14 A. It does.</p> <p>11:03:23 15 Q. Can you tell me what those other voice</p> <p>11:03:26 16 recognizers are called?</p> <p>11:03:28 17 A. They're called CCR.</p> <p>11:03:30 18 Q. Okay.</p> <p>11:03:32 19 A. And Elvis.</p> <p>11:03:37 20 Q. Okay. Can you tell me what the difference</p> <p>11:03:39 21 between Elvis and Voice Tag is?</p> <p>11:03:42 22 MR. POPEO: Objection.</p> <p>11:03:51 23 A. I don't believe I can at any meaningful level.</p> <p>11:03:54 24 Q. Is Elvis a product that Voice Signal offers to</p>

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<p>11:03:57 1 customers?</p> <p>11:03:58 2 MR. POPEO: Object to the form of the</p> <p>11:03:59 3 question. If you understand it, you can answer</p> <p>11:04:01 4 it.</p> <p>11:04:01 5 A. No, we don't offer Elvis as a product.</p> <p>11:04:04 6 Q. Do you offer Voice Tag as a product?</p> <p>11:04:08 7 MR. POPEO: Same objection.</p> <p>11:04:10 8 A. No.</p> <p>11:04:10 9 Q. So am I right that the only way that a customer</p> <p>11:04:16 10 gets to use Voice Tag is if they license</p> <p>11:04:20 11 VSuite --</p> <p>11:04:20 12 MR. POPEO: Objection.</p> <p>11:04:24 13 Q. -- and Voice Tag is contained in VSuite; is that</p> <p>11:04:27 14 right?</p> <p>11:04:31 15 A. I'm sorry. Can you rephrase?</p> <p>11:04:33 16 Q. In other words, you don't sell or license Voice</p> <p>11:04:35 17 Tag to customers?</p> <p>11:04:36 18 A. Correct.</p> <p>11:04:37 19 Q. And am I right that you don't sell or license</p> <p>11:04:41 20 CCR to customers?</p> <p>11:04:44 21 MR. POPEO: Of itself?</p> <p>11:04:45 22 MS. FLEMING: Of itself.</p> <p>11:04:47 23 A. That's correct.</p> <p>11:04:53 24 Q. Am I correct that the only two products that</p>	<p>11:05:52 1 MR. POPEO: Yes or no, please.</p> <p>11:05:53 2 A. I don't believe so.</p> <p>11:05:56 3 Q. Okay. Now, I apologize if I asked this earlier,</p> <p>11:06:05 4 but your counsel will point that out to me if I</p> <p>11:06:09 5 did. Is the software that Voice Signal</p> <p>11:06:11 6 developed for Lamp Commander different than the</p> <p>11:06:15 7 software developed for VSuite?</p> <p>11:06:17 8 MR. POPEO: Objection. You can</p> <p>11:06:19 9 answer.</p> <p>11:06:19 10 A. Yes.</p> <p>11:06:19 11 Q. How is it different, if you know?</p> <p>11:06:23 12 MR. POPEO: Same objection, but you</p> <p>11:06:25 13 can try to answer.</p> <p>11:06:26 14 A. I don't know.</p> <p>11:06:26 15 Q. But you just know that it's different?</p> <p>11:06:28 16 A. I know software that controls a lamp is not the</p> <p>11:06:33 17 same as software that goes into a phone.</p> <p>11:06:35 18 MR. POPEO: And by that, I take it</p> <p>11:06:36 19 you're asking whether it's identical to the --</p> <p>11:06:39 20 MS. FLEMING: No, I'm just asking if</p> <p>11:06:41 21 he knows what the differences are.</p> <p>11:06:42 22 MR. POPEO: Okay. I think he's</p> <p>11:06:43 23 answered that question.</p> <p>11:06:45 24 A. I don't know the differences.</p>
Page 47	Page 49
<p>11:04:57 1 Voice Signal licenses in the wireless handset</p> <p>11:05:00 2 market are VSuite and VoiceMode?</p> <p>11:05:06 3 MR. POPEO: Object to the form.</p> <p>11:05:07 4 A. I believe I also mentioned PC Link.</p> <p>11:05:09 5 Q. I'm sorry, and PC Link. Are those three</p> <p>11:05:13 6 products the only products -- I recognize they</p> <p>11:05:17 7 may be different versions of the product, but</p> <p>11:05:20 8 are they the only products -- only three</p> <p>11:05:23 9 products that Voice Signal sells in the wireless</p> <p>11:05:26 10 handset market?</p> <p>11:05:28 11 MR. POPEO: Object to the term</p> <p>11:05:32 12 "sells."</p> <p>11:05:33 13 A. Yes, I believe so.</p> <p>11:05:33 14 Q. And are they the only three products that Voice</p> <p>11:05:37 15 Signal licenses in the wireless handset market?</p> <p>11:05:41 16 A. That's my understanding.</p> <p>11:05:41 17 Q. And are there other products in development at</p> <p>11:05:42 18 Voice Signal in the wireless handset market?</p> <p>11:05:42 19 MR. POPEO: Object to the form. You</p> <p>11:05:44 20 can answer that as a yes or no, please.</p> <p>11:05:46 21 A. Can you repeat?</p> <p>11:05:47 22 Q. Sure. Are there other products that Voice</p> <p>11:05:49 23 Signal is developing in the wireless handset</p> <p>11:05:51 24 market?</p>	<p>11:06:47 1 Q. But you know there are differences?</p> <p>11:06:48 2 A. It's my belief there are differences.</p> <p>11:06:51 3 Q. And what do you base that belief on?</p> <p>11:06:52 4 A. I base that belief on the time frame in which</p> <p>11:06:57 5 the software was developed for Lamp Commander.</p> <p>11:07:02 6 I don't believe any piece of software is static</p> <p>11:07:04 7 for years and years and years. So that's my</p> <p>11:07:07 8 primary reason. And the application is,</p> <p>11:07:09 9 obviously, much different.</p> <p>11:07:11 10 Q. Okay. Now, you testified that at some point in</p> <p>11:07:23 11 late 1999, the company began to develop products</p> <p>11:07:29 12 in areas other than the toy marketplace; is that</p> <p>11:07:33 13 right?</p> <p>11:07:33 14 A. That's my recollection, yes.</p> <p>11:07:35 15 Q. And were you involved in the decision to move</p> <p>11:07:39 16 into the wireless handset market space?</p> <p>11:07:42 17 A. I believe I was.</p> <p>11:07:43 18 Q. Okay. And am I right that part of the decision</p> <p>11:07:49 19 involved discussions that you had with Dan Roth?</p> <p>11:07:52 20 A. I believe so.</p> <p>11:07:52 21 Q. Okay. And do you know whether there are</p> <p>11:07:55 22 documents that reflect those discussions at</p> <p>11:07:58 23 Voice Signal?</p> <p>11:07:59 24 MR. POPEO: Objection.</p>

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<p>13:09:05 1 front of you Versions 1.2 and 2.0. And earlier,</p> <p>13:09:10 2 you testified that there was documentation that</p> <p>13:09:13 3 would accompany your products that go to</p> <p>13:09:18 4 particular entities that you license the product</p> <p>13:09:21 5 to; is that correct?</p> <p>13:09:22 6 MR. POPEO: Objection.</p> <p>13:09:22 7 Q. Did I state that accurately?</p> <p>13:09:24 8 MR. POPEO: Objection,</p> <p>13:09:26 9 mischaracterizes.</p> <p>13:09:27 10 A. What I stated was that this document in whole or</p> <p>13:09:30 11 in part could be provided to our customers.</p> <p>13:09:32 12 Q. And when you say "this document," you're</p> <p>13:09:36 13 referring to Exhibit 2?</p> <p>13:09:36 14 A. Any of the user interface descriptions, yes.</p> <p>13:09:39 15 Q. They could be. And I believe you testified that</p> <p>13:09:42 16 there may be other documents that are sent along</p> <p>13:09:45 17 with your product. For instance, I think you</p> <p>13:09:49 18 said a user manual. Do you remember that?</p> <p>13:09:50 19 MR. POPEO: Objection.</p> <p>13:09:51 20 A. Again, I think I said that in some cases, we may</p> <p>13:09:56 21 have sent an end user manual that describes to</p> <p>13:09:58 22 an end user how they might use it so that the</p> <p>13:10:01 23 OEM customer can write their user guide for the</p> <p>13:10:04 24 product manual.</p>	<p>13:11:03 1 with VoiceMode?</p> <p>13:11:05 2 A. For the exact same reasons that I stated before</p> <p>13:11:08 3 for VSuite.</p> <p>13:11:09 4 Q. Which are?</p> <p>13:11:12 5 MR. POPEO: Objection. You can answer</p> <p>13:11:14 6 again if you can.</p> <p>13:11:14 7 A. Okay. One, to notify the customer of the</p> <p>13:11:19 8 behavior of the product from us that they're</p> <p>13:11:22 9 receiving; two, so that they know how to test it</p> <p>13:11:28 10 for compliance, and the third reason, which I</p> <p>13:11:31 11 don't think I mentioned before, would be if</p> <p>13:11:32 12 their documentation department for their product</p> <p>13:11:37 13 manuals needed to understand how to describe the</p> <p>13:11:39 14 functionality to an end user, they might refer</p> <p>13:11:42 15 to this as well.</p> <p>13:11:44 16 Q. And would the same be true for Voice Tag?</p> <p>13:11:46 17 MR. POPEO: Object to the form of the</p> <p>13:11:47 18 question.</p> <p>13:11:48 19 A. No, I think I stated Voice Tag is a speech</p> <p>13:11:50 20 recognition engine. It's not sold as a product.</p> <p>13:11:53 21 Q. And is there any other product in the speech</p> <p>13:11:56 22 recognition area that you would license to a</p> <p>13:12:00 23 customer and provide documentation with?</p> <p>13:12:03 24 MR. POPEO: Objection, asked and</p>
Page 119	Page 121
<p>13:10:05 1 Q. Okay. Now -- and you testified earlier that</p> <p>13:10:16 2 there are other products that Voice Signal</p> <p>13:10:19 3 offers to or sells or licenses to manufacturers,</p> <p>13:10:22 4 correct?</p> <p>13:10:23 5 MR. POPEO: Objection. You can</p> <p>13:10:24 6 answer.</p> <p>13:10:24 7 A. I did.</p> <p>13:10:25 8 Q. And one such product is VoiceMode; is that</p> <p>13:10:31 9 correct?</p> <p>13:10:31 10 A. Yes.</p> <p>13:10:32 11 Q. And is it also true that with the product</p> <p>13:10:35 12 VoiceMode, Voice Signal might send similar</p> <p>13:10:40 13 documentation along with the product to the</p> <p>13:10:41 14 customer?</p> <p>13:10:42 15 MR. POPEO: Objection.</p> <p>13:10:43 16 A. Similar to?</p> <p>13:10:44 17 Q. To these user interface specifications or some</p> <p>13:10:49 18 other specifications or end user manuals that</p> <p>13:10:51 19 you described earlier.</p> <p>13:10:52 20 MR. POPEO: Objection. You can</p> <p>13:10:54 21 answer.</p> <p>13:10:54 22 A. Yes, we would send a similar user interface</p> <p>13:10:57 23 document.</p> <p>13:10:58 24 Q. And why would you send a user interface document</p>	<p>13:12:04 1 answered. You can answer it again.</p> <p>13:12:06 2 A. No.</p> <p>13:12:07 3 Q. By the way, in connection with this litigation,</p> <p>13:12:10 4 have you been asked to search for documents?</p> <p>13:12:13 5 MR. POPEO: Yes-or-no answer.</p> <p>13:12:15 6 A. Can you -- which type of documents?</p> <p>13:12:17 7 Q. Any.</p> <p>13:12:19 8 A. Yes.</p> <p>13:12:19 9 Q. You have been?</p> <p>13:12:20 10 A. Yes.</p> <p>13:12:20 11 Q. And did you search for documents?</p> <p>13:12:22 12 A. I produced documents to our lawyers.</p> <p>13:12:24 13 Q. To your lawyers?</p> <p>13:12:25 14 A. Yes.</p> <p>13:12:25 15 Q. And what were the kinds of documents you</p> <p>13:12:30 16 produced in general terms?</p> <p>13:12:33 17 A. Well, documents from my group, and specifically,</p> <p>13:12:39 18 these user interface documents are an example.</p> <p>13:12:42 19 Q. And you're referring to Exhibits 2 and 3?</p> <p>13:12:44 20 A. Yes.</p> <p>13:12:53 21 Q. Now, I would like to go back to Exhibit 1, if I</p> <p>13:12:56 22 can. Let me ask you, if you would -- it may not</p> <p>13:13:27 23 do any good to count. You may know better than</p> <p>13:13:30 24 me. I'm looking for the manufacturers listing.</p>

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13:13:35	1 Manufacturers.	13:15:29	1 product would be the speech recognizer or the
13:13:36	2 MR. POPEO: What does the front page	13:15:33	2 speech engine; is that right?
13:13:38	3 look like?	13:15:34	3 MR. POPEO: Objection. You can
13:13:39	4 MS. FLEMING: The front page has Voice	13:15:36	4 answer.
13:13:43	5 Signal at the top, and it has manufacturers and	13:15:36	5 A. Yes.
13:13:46	6 has Samsung, Motorola, and Nokia listed. It's	13:15:36	6 Q. Do you know what documentation was provided to
13:13:46	7 about three-quarters of the way in, maybe	13:15:41	7 Samsung with VSuite 2.0?
13:13:50	8 two-thirds in. If you want to give it to me, I	13:15:46	8 A. I do not, no.
13:13:52	9 can find it.	13:15:47	9 Q. How about with VSuite 1.3?
13:13:53	10 MR. POPEO: We know it's in here.	13:15:50	10 A. No.
13:13:55	11 Hold on.	13:15:50	11 Q. How about with VoiceMode?
13:13:55	12 MS. FLEMING: It's after Products,	13:15:52	12 A. No.
13:14:01	13 well after Products.	13:15:52	13 Q. Do you know if any documentation was provided to
13:14:02	14 MR. POPEO: Trade you.	13:15:55	14 Samsung?
13:14:04	15 MS. FLEMING: Thank you.	13:15:56	15 A. It's my belief that the documents we already
13:14:04	16 Q. Now, Mr. Lazay, this is part of, again,	13:15:59	16 discussed were in some form provided to Samsung
13:14:09	17 Exhibit I, which is the printout of Voice	13:16:04	17 along the way.
13:14:12	18 Signal's Web site. Would you agree with that?	13:16:05	18 Q. In some form?
13:14:14	19 MR. POPEO: Objection.	13:16:06	19 A. Yes.
13:14:15	20 A. It looks that way, yes.	13:16:06	20 Q. Do you know who might know that or might be
13:14:17	21 Q. And I've referred you to a particular listing of	13:16:09	21 better able to answer that question?
13:14:20	22 manufacturers, correct?	13:16:10	22 A. Again, there's no single person for this kind of
13:14:21	23 A. Yes.	13:16:13	23 role that you're describing.
13:14:21	24 Q. And am I correct that those manufacturers are	13:16:15	24 Q. Do you know any person at Voice Signal that
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13:14:24	1 customers of Voice Signal?	13:16:18	1 interacts specifically or communicates
13:14:26	2 A. I believe so, yes.	13:16:21	2 specifically with Samsung?
13:14:27	3 Q. Okay. And if you would look at the first	13:16:22	3 MR. POPEO: Do you mean exclusively?
13:14:32	4 manufacturer, it indicates it's Samsung. Do you	13:16:25	4 MS. FLEMING: Well, no, I'm looking
13:14:34	5 see that?	13:16:28	5 for any person or persons.
13:14:35	6 A. I do.	13:16:29	6 A. It could be a large range of people, ranging
13:14:35	7 Q. And what is Samsung a customer of for Voice	13:16:32	7 from people on the executive team, like Dan
13:14:40	8 Signal?	13:16:35	8 Roth, to various members of the sales team to
13:14:40	9 MR. POPEO: Objection.	13:16:39	9 the engineers down to some of my staff.
13:14:41	10 A. Can you rephrase that?	13:16:43	10 Q. Okay. Now, the next manufacturer listed on the
13:14:45	11 Q. Sure. Do you license products to Samsung?	13:16:47	11 Web page is Motorola. Do you see that?
13:14:47	12 A. We do.	13:16:52	12 A. Yes.
13:14:47	13 Q. What products do you license to Samsung?	13:16:52	13 Q. And what products does Voice Signal license to
13:14:51	14 A. VSuite and VoiceMode.	13:16:55	14 Motorola, if you know?
13:14:55	15 Q. Which version of VSuite?	13:16:58	15 A. The VSuite products.
13:14:58	16 MR. POPEO: If you can recall.	13:17:00	16 Q. Okay. Any particular versions that you know?
13:15:00	17 A. The versions I can recall are 1.3 and 2.0, and	13:17:03	17 A. 1.2 and -- I'm sorry. Strike that. 2.0 and one
13:15:05	18 they may have also licensed earlier versions.	13:17:14	18 of the previous -- one or more of the previous
13:15:08	19 Q. Okay. And any other products besides VSuite and	13:17:17	19 versions, but I'm not exactly sure.
13:15:12	20 VoiceMode?	13:17:18	20 Q. Does Motorola have a product on the market --
13:15:14	21 A. PC Link, I believe, as well.	13:17:24	21 are they selling a product to the public that
13:15:17	22 Q. Any other products?	13:17:26	22 contains 2.0?
13:15:21	23 A. No, I don't think so.	13:17:28	23 MR. POPEO: Objection.
13:15:22	24 Q. Okay. And, again, included in the VSuite	13:17:28	24 A. No, they're not.

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